



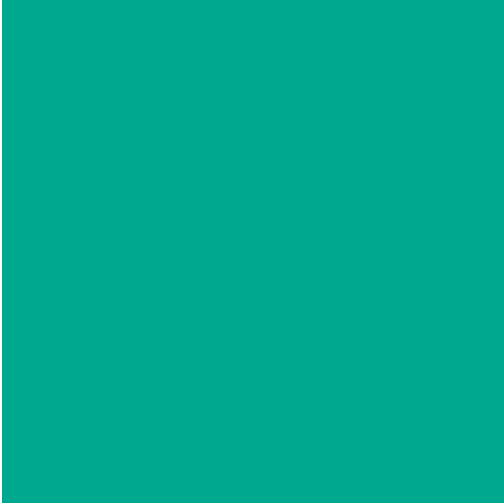
DESIGN, ACCESS & PLANNING STATEMENT

Site: 1 Brookdene Drive/
20 Watford Road, Northwood,
London HA6 3NS/T

For: Clearview Residential Limited

Project Ref: SJB/17042_DAPS

June 2019



Prepared by:
Steven J Barker MA (Cantab) MA MRTPI
Director (Managing)
Barker Parry Town Planning Ltd
33 Bancroft, Hitchin, Herts SG5 1LA



CONTENTS PAGE

Section	Title	Page
1.0	INTRODUCTION	
2.0	RECENT PLANNING HISTORY	
3.0	DESCRIPTION OF SITE AND SURROUNDINGS	
4.0	REVIEW OF RELEVANT POLICY	
5.0	ASSESSMENT	
6.0	SUMMARY AND CONCLUSIONS	
Appendix 1	Planning Decision Notice 71665/APP/2018/3820	
Appendix 2	Approved Drawings	
Appendix 3	Schedules showing approved and proposed flatted accommodation	
Appendix 4	Previous Planning Statement SJB/17042_PS October 2018 together with Appendices	
Appendix 5	Hillingdon Local Plan Pt 2 Main Modifications (Extract)	

Plans and Documents Accompanying the Application

Arboricultural and Planning Integration Report
Tree Protection Plan
Transport Statement
SUDS Drainage Statement
Energy Statement
CIL Form 2019
Financial Viability Report (To Follow)
Watford Road – Area Schedule

Drawings:
314-PL-100-00 – Proposed Site Plan
314-PL-200-02 – Proposed Ground Floor Plan
314-PL-201-02 – Proposed First Floor Plan
314-PL-202-02 – Proposed Second Floor Plan
314-PL-203-01 – Proposed Roof Plan
314-PL-300-01 – Proposed Front Elevation
314-PL-301-01 – Proposed South Elevation
314-PL-302-01 – Proposed East Elevation
314-PL-303-01 – Proposed North Elevation
314-PL-304-01 – Proposed Street Scene
314-PL-010-00 – Site Location Plan
314-PL-011-00 – Existing Site Plan
314-PL-012-00 – Existing Watford Road
314-PL-013-00 – Existing Brookdene Drive

1.0 **INTRODUCTION**

1.1 This Statement is prepared on behalf of the applicants, Clearview Residential Ltd, in support of their application to vary the approved plans for their extant approval to redevelop 1 Brookdene Drive / 20 Watford Road, Northwood. Although permission is sought to vary the drawings it does increase the number of dwellings from 9 to 12 and consequently also changes the application from 'Minor' to 'Major' so, despite recent case law expanding the scope of what may be considered as a S73 application, it has been decided to submit a new full application which requires a Design & Access Statement. Nonetheless, it is proportionate to the nature of the proposed changes.

- 1.2 As is clear from the application form, the change sought is to a planning permission dated 7 March 2019 which remains extant until March 2022 (71665/APP/2018/3820) and a copy of which is attached as **Appendix 1**. That approval was, however, the culmination of an iterative process. The applicants first took out an option on the subject properties in 2015. They carried out pre-app discussions and submitted an outline application in September 2016 (71665/APP/2016/3363) for 10 flats.
- 1.3 This was refused in April 2017 for a variety of reasons. A subsequent appeal (APP/R5510/W/17/3181349) was dismissed, but solely because of an accepted need to have a Legal Agreement in place and the Inspector finding against its wording. The Agreement was required because being an outline scheme, the proposal could, at the subsequent reserved matters stage, have triggered consideration of affordable provision.
- 1.4 Owing to the Inspector having not accepted the other reasons for refusal, a further application was submitted resulting in the above mentioned extant approval. This decision permits the demolition of the existing pair of houses, the closing off of the Watford Road access (to No 20), the reuse of the Brookdene Drive access to serve car parking (12 spaces) and bin and bike storage and, the erection of a 3 storey building of self-contained flatted accommodation.
- 1.5 These comprise 9 2 bed 4 people apartments with 3 habitable rooms each. 4 of the flats also have dedicated separate study areas. They range in terms of usable floorspace (NIA) from 85m² to 117m² and each has a private garden/balcony. They were expressly aimed at the “empty nester/downsizer” market and people, many of whom live locally and have done for many years, who want a more manageable property in the area. Copies of the approved plans are attached as **Appendix 2**.

- 1.6 The applicants are based in Northwood and know the north-west London market and the adjoining areas of the home countries very well. Since they first secured this site the market has changed. Aside from the economic implications and uncertainties of BREXIT, the revisions to stamp duty thresholds and the higher rates for buy-to-let investors and the Help to Buy Scheme have all subtly but significantly altered the market for small/medium flats since 2015.
- 1.7 Consequently, in order to meet today's market housing needs, see permissions realised and dwellings occupied and reduce friction in the housing market, they seek approval to reconfigure internally the approved building and tailor it to the current market need. As a consequence, whilst retaining six 2 bed 2 bath flats, only two of these would now have study areas and the remaining three are now reconfigured as six 1 bed/1 bath flats.
- 1.8 There is no change proposed to the footprint, floorspace, height, volume or external appearance of the approved building. This is confirmed by the two schedules attached as **Appendix 3** wherein the only differences are the number and sizes of the flats and their respective amenity spaces. That being the case, there is no need to revisit the principle of flatted development at this site, but instead focus on the revised mix and numbers and related amenity space, parking provision etc and see whether, judged against current prevailing policy, the details of the proposal remain compliant.
- 1.9 To assist, a copy of the previous Planning Statement is attached as **Appendix 4** and will be taken as read. This statement is cross referenced and uses the same headings with up-dates and additions as relevant.

2.0 **RECENT PLANNING HISTORY**

- 2.1 The approval which it is sought to vary is attached as **Appendix 1** along with the approved drawings (**Appendix 2**). It will be familiar to officers but is included to enable easy comparison with the internal changes now sought and the minor consequent manifestations within the grounds. The principal changes are set out in the Introduction (above) and will be discussed in terms of policy and guidance below.

3.0 **DESCRIPTION OF THE SITE & SURROUNDINGS**

- 3.1 This matter featured prominently in the assessment of the original scheme and subsequent appeal. The principle of flatted development in this part of Watford Road and its effect upon the street scene was established as acceptable by the Inspector and reaffirmed and endorsed in the March 2019 approval.
- 3.2 Notwithstanding, the fact that the 2019 approval is extant and capable of implementation, since it's approval there have been no material changes to either the character and appearance of the site or its immediate surroundings. Consequently, in assessing this application there is no reason not to conclude that a further approval for an almost identical flatted building and grounds is not equally appropriate in visual terms as when considered earlier this year.

4.0 **REVIEW OF RELEVANT POLICY**

The Development Plan

- 4.1 There has been little change of note since the previous Planning Statement (PS) was prepared **(A4)** in late 2018 and the application decided in early 2019, other than progress with emerging plans. **The Hillingdon Local Plan Part 2** had been submitted for Examination in May 2018. Hearing sessions were held in August and the Inspector issued his Post Hearing Advice Note in November 2018.
- 4.2 The Council's response followed in February 2019 and consultation into the Proposed Main Modifications closed in May 2019. Responses are yet to be considered by the Council and Inspector, but it is anticipated that Part 2 will be adopted later this year and finally replace the saved non-strategic policies of the 1998 adopted UDP.
- 4.3 The **draft New London Plan 2018** has similarly undertaken an Examination in Public which ran from January to May 2019 and was conducted by a Panel of Inspectors. The Panel's Report is awaited.
- 4.4 The statutorily adopted policy remains as at March 2019 and relevant policies and guidance remain as is the previous PS **(A4)**.

SPD

- 4.5 Published supplementary guidance remains as assessed for the 2018/19 application.

National Policy

4.6 Both the **National Planning Policy Framework** (NPPF) and the complementary **Planning Policy Guidance** (PPG) has changed since the recent application was considered. The 2018 republished NPPF was further revised in February 2019 and the continually updated PPG has also been revised during 2019.

4.7 Of particular relevance to this proposal is national policy and guidance in respect of: affordable provision; planning obligations and viability all of which are not unrelated.

Affordable provision/planning obligations

4.8 At the time the last application was considered, there was a degree of inconsistency either between and/or within both local and national policy. That is now largely reconciled and as proposed to be varied the proposal for flatted development does qualify as 'major' development by virtue of the fact that the reconfiguration to create 12 dwellings means that the 10 or more threshold to which the NPPF, PPG and now emerging plans all refer is applicable and consequently so is guidance on viability; also revised recently.

4.9 In all other respects, national guidance is largely unchanged but by way of an aide memoire relevant NPPF paragraphs are as follows:

2-3, 7-12, 38, 47-48, 61-64, 68, 117-124, 127 and Annex 2

5.0 **ASSESSMENT**

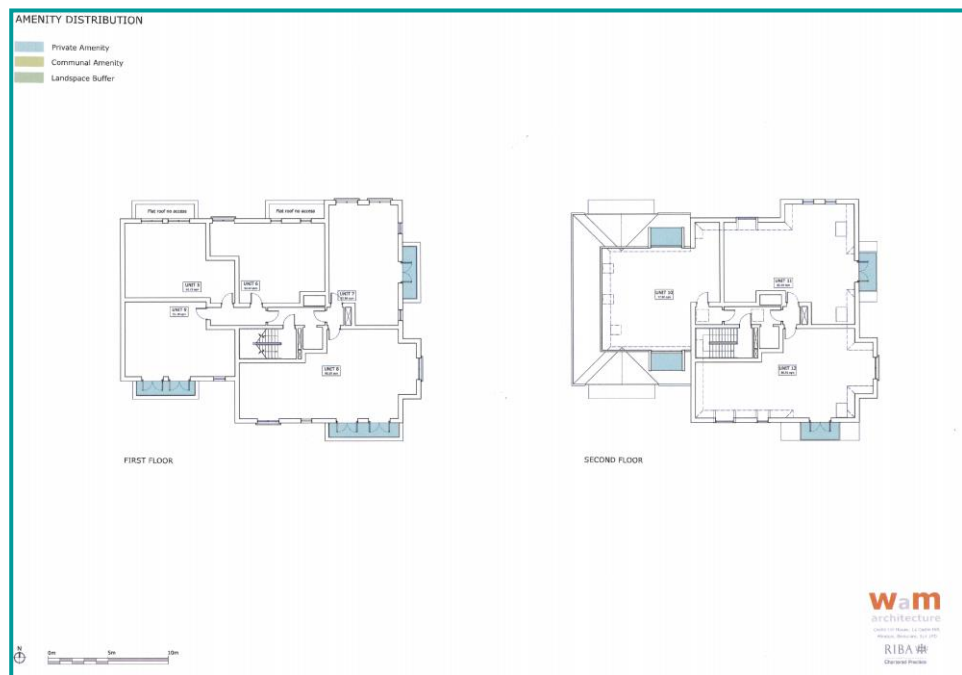
- 5.1 As with the previous PS it is probably useful to structure this section under the conventional DAS headings and identify those matters which need to be revisited.

Use

- 5.2 As referred to in the site description, a block of flats set in landscaped grounds has been endorsed in the 2018 appeal decision and 2019 Planning approval. As the changes are entirely internal, then there can be no objection to a flatted residential use in a suburban residential area.

Amount

- 5.3 Neither the footprint nor the floorspace within the building envelope differs from the recent planning approval. This is confirmed by the schedules attached in **Appendix 3**.
- 5.4 The intensity of the use has increased, but this has no obvious external manifestations. The balconies and patios approved previously remain and one of these is now attached to one of the smaller flats. The other terraces and balconies remain with the larger flats, but as three of the new 1 bed flats have no private amenity space, parts of the large gardens given previously to two of the approved ground floor flats are now for communal use. The proposed provision and distribution of amenity space is as shown on the images scanned in over (and the schedule in **Appendix 3**) and would comply with relevant guidance.



5.5 In terms of parking provision despite there being the same number of bedrooms and bed spaces within the property, the parking provision

guidance is the same for both 1 and 2 bedroom flats being 1 to 1.5 spaces per dwelling. The provision, therefore, remains policy compliant.

- 5.6 12 parking spaces remain so there is no visual change and the applicants have commissioned a Transport Statement (in letter form) which refers to the relevant policy, levels of car ownership etc and concludes that the parking provision is both compliant and acceptable for the level of accommodation proposed. Similarly, the likely level of traffic generation occasioned by six 1 bedroom flats in lieu of 3 2 bedroom flats has been assessed and found to be acceptable.
- 5.7 The bicycle storage area has been revised to accommodate the 2 extra spaces as advised by the relevant guidance and the approved bin store is also capable of absorbing the additional requirements of 3 additional households.
- 5.8 Expressed in terms of households or dwellings, the density of the site has increased. This, however, is *an* index of density. As is clear, the building is no bigger in any respect and the level of soft and hard landscaping is the same. Visually there would be no difference.
- 5.9 Looked at functionally these three additional dwellings are designed to accommodate a maximum of two people each. As the schedules in **Appendix 3** confirm, the number of habitable rooms in the building would increase by 3 (or 11%) whilst the number of bedrooms and bed spaces would remain identical at 18 and 36 respectively.
- 5.10 There can, therefore, be no reasonable concern that the proposal is "overdevelopment" by reason of increased density having regard to most acknowledged indexes of density. It is also relevant to point out that in the Proposed Main Modifications to Hillingdon Local Plan Part 2, the Council

has taken heed of the density guidance found in the London Plan. An extract is attached as **Appendix 5**.

- 5.11 Table 5.3 (Residential Density Matrix) sets out figures for differing types of dwellings as categorised by PTAL rating and locations. Whilst maintaining the submitted figures for detached/linked dwellings in all situations, those for terraced houses and flats/mostly flats are all now proposed to have higher upper limits to their habitable room/dwelling per hectare figures.
- 5.12 As established in the Transport Statement, the site is within 800m of a town centre and an underground station and in an area with a PTAL rating of 2. Table 5.3 provides figures for areas with PTAL of 0-2 and 2-3 (where within 800m of a town centre). The lowest density figure for houses in the 0-2 category is 105hrh and the highest for flats is 300hrh. In the 2-3 category it is 105 to 330hrh.
- 5.13 The application site is suburban, close to a town centre and typified by low rise residential development of houses and flats. The application site has an approval for flats and at 0.12h in extent the hrh as approved is 225 (27 hab rooms) and as proposed 250 (30 hab rooms). Each is comfortably within the upper limits set out in Table 5.3 and further confirms the acceptability of the amount of units now proposed.
- 5.14 The only other manifestations of amount is theoretical ie exceeding the 10 unit threshold which means that the proposal is now eligible for consideration for both affordable provision and developer contributions.

Developer Contributions

- 5.15 CIL is in place in Hillingdon and provides a 'flat tax' for new floorspace. The previous approval was liable and so would any fresh approval and as the

floorspace is identical then so would the amount payable. A completed CIL form is included.

- 5.16 In terms of other obligations various contributions were suggested at the time of the original (appeal) scheme, but none was accepted by the Inspector and they were not requested in March when the revised application was submitted. There is nothing unique to the site that needs to be secured to make any approval acceptable so there is no need to provide general contributions by way of a Legal Agreement.

Affordable Provisions

- 5.17 It is entirely legitimate in making a decision to consider affordable provisions. This is a fresh application and the internal reconfiguration results in 12 dwellings. Similarly it is the responsibility of the applicant to address viability and if it can be shown that to make affordable provision in accordance with relevant policy is not viable then lack of affordable provision cannot be a reason for refusal. The applicants will submit a report in respect of viability directly to the appointed case officer following validation.

Layout

- 5.18 Insofar as the layout differs from that approved, the slight changes are discussed above. In terms of the public realm the approved and proposed schemes would be indistinguishable.

Scale

- 5.19 Again, the building envelope is identical to that approved so similar comments apply.

Appearance

- 5.20 The design, detailing and materials proposed are all the same as the extant approval.

Landscaping

- 5.21 The only difference with this proposal is that the bulk of the "front garden" facing Watford Road and lying outside the "defensible" terraces for Flats 3 & 4 would not be private garden, but rather communal grounds. As such it is likely to have a more uniform appearance owing to its being maintained by the Management company, but overall there would again be no discernible difference in the public realm.

Access/Parking

- 5.22 This has been addressed under the amount heading and by the applicant's highways consultant.

Other Matters

- 5.23 The technical reports which accompanied both earlier applications are listed in the Introduction, reattached, updated as necessary and referred to above where required. Mindful of the provisions of the London Plan this submission includes an Energy Statement.

SUMMARY & CONCLUSIONS

- 6.1 This planning application seeks simply to vary the number and size of dwellings within an approved 3 storey flatted building. It is a standalone

proposal and it must be determined as such having regard to all relevant material considerations both at the site and surroundings and by applying national and local policy.

- 6.2 Nothing has changed at the site and surroundings in the last few months and the principle of a small flatted development, in particular one which would make no difference to the public realm than that approved, is therefore equally acceptable. Indeed, the emerging Local Plan Part 2 as proposed to be modified recognises the need for increased densities to meet housing needs within established urban areas.
- 6.3 In this regard, the increase in bedrooms and bedspaces would be nil, but there is a slight increase in habitable rooms and in dwelling numbers. The reason for this is that the market for smaller flats has changed since the applicants first took an interest in this site in 2015. Unless developers are alert to these changes and respond, the needs for market housing will not be met effectively.
- 6.4 Insofar as these extra (but smaller) dwellings manifest themselves, there is no visual impact whatsoever. From a functional point of view, the relevant matters are parking, bin and bike storage and the provision of amenity space. All are addressed in this new application and relevant policy and guidance is complied with.
- 6.5 The application is, therefore, commended for approval and in the interim we will be pleased to clarify or amplify any matter or address any consultation responses.